

William J. Squires III  
Direct Phone: 617.951.8273  
Direct Fax: 617.428.6442  
william.squires@bingham.com

October 4, 2012

## Via Fed-Ex and Email

Michael A. Mintzer  
Assistant Regional Counsel, New York Superfund Branch  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region II  
290 Broadway, 17th Floor  
New York, NY 1007-1866

## Re: Response to Request for Information -- Newtown Creek Superfund Site, Kings County and Queens County, New York

Dear Mr. Mintzer:

I write on behalf of Schnitzer Steel Industries, Inc. ("SSI") in response to the Request for Information dated June 12, 2012 (the "Information Request") that the U.S. Environmental Protection Agency ("EPA") sent to SSI concerning the Newtown Creek Superfund Site (the "Site") and the facility located at 30-27 Greenpoint Avenue, Long Island City, New York (the "Facility"). This response is being timely submitted within the extended deadline of October 5, 2012.

SSI has never owned or operated the Facility or the Site. As part of a joint venture between Hugo Neu Corporation ("HNC") and an indirect subsidiary of SSI, Joint Venture Operations, Inc. ("JVOI"), SSI indirectly held a 50% partnership interest in Hugo Neu Schnitzer East ("HNSE") from January 30, 1998 to September 30, 2005. During that time period, HNSE or a predecessor conducted scrap metal operations at the Facility. Please refer to the Responses of Schnitzer Steel Industries, Inc. to Request for Information enclosed herewith as Attachment A and the corporate organization chart enclosed as Attachment B for additional detail.

The only document in the possession of SSI relating to the Facility is the index provided as Attachment C titled "Document Summary by Site," dated November 27, 1996. The index was prepared by representatives of SSI during an in person due diligence document review conducted prior to the consummation of the joint venture with HNC. The redacted portions of the document relate to other facilities that have no relation to the Facility or the Site.

It is our understanding that EPA has sent information requests regarding the Facility and the Site to other entities, including HNC and Simsmetal East LLC ("Sims"). We have reviewed the response letter from HNC and Sims. Please note that SSI has made no

Beijing  
Boston  
Frankfurt  
Hartford  
Hong Kong  
London  
Los Angeles  
New York  
Orange County  
San Francisco  
Santa Monica  
Silicon Valley  
Tokyo  
Washington

Bingham McCutchen LLP  
One Federal Street  
Boston, MA 02110-1726

T +1.617.951.8000  
F +1.617.951.8736  
bingham.com

A/75186834.3

Michael A. Mintzer  
October 4, 2012  
Page 2

independent effort to confirm the veracity or accuracy of the responses provided by HNC and Sims.

This response does not constitute, and should not be construed as, an admission of any kind. SSI reserves its rights to assert any and all defenses to liability or responsibility with respect to the Facility or the Site, including, without limitation, all defenses and exemptions under CERCLA or principles of corporate law.

Should you have any questions please feel free to contact me.

Sincerely yours,

A handwritten signature in black ink that reads "W. Squires III". The signature is fluid and cursive, with the "III" written in a stylized, slightly detached manner at the end.

William J. Squires III

Enclosure: Document Summary by Site - Due Diligence list from 1996

cc: Caroline Kwan (via e-mail)  
Remedial Project Manager  
New York Remediation Branch  
Emergency and Remedial Response Division  
U.S. Environmental Protection Agency, Region II  
290 Broadway, 20th Floor  
New York, New York 10007-1866  
kwan.caroline@epa.gov

Richard C. Josephson, Esq. (via e-mail)  
Thomas Zelenka (via e-mail)  
Andrew Feuerstein, Esq. (via e-mail)  
Richard Fil, Esq. (via e-mail)  
Earl Phillips, Esq. (via e-mail)

## **ATTACHMENT A**

### **RESPONSES OF SCHNITZER STEEL INDUSTRIES, INC. TO REQUEST FOR INFORMATION**

Schnitzer Steel Industries, Inc. ("SSI" or the "Company") hereby responds to the United States Environmental Protection Agency's ("EPA's") June 12, 2012 Request for Information Pursuant to Section 104 of CERCLA made to the Company concerning the Newtown Creek Superfund Site (the "Site").

#### **PRELIMINARY STATEMENT AND GENERAL OBJECTIONS**

With respect to its response, SSI asserts the following privileges, reservations of rights, and objections with regard to EPA's Request for Information:

(A) SSI asserts all applicable privileges it has or may have with regard to EPA's enumerated inquiries including the attorney-client privilege, the attorney work product privilege and privileges for materials which are proprietary, company confidential, or trade secret;

(B) SSI objects to the requests on the grounds that the requests and instructions relating thereto use undefined terms and are overbroad, vague, ambiguous, irrelevant and unduly burdensome so as to exceed statutory authority under CERCLA and contravene SSI's constitutional rights. In responding to these requests, SSI relies on the definition of these terms as they are commonly used (i.e., their dictionary definitions);

(C) SSI objects to any requirement to produce documents or information already in the possession of a government agency, or already in the public domain; and

(D) SSI hereby disavows any obligation to supplement these responses on an ongoing basis.

Subject to the aforementioned privileges, reservations and objections, SSI responds to the specific requests for information as follows.

#### **Section 1.0 Company Information**

1. **Company Identification:** Provide the following information with respect to the Company.

a. **The full legal, corporate name and mailing address.**

Schnitzer Steel Industries, Inc.  
3200 Northwest Yeon Avenue  
Portland, Oregon 97210

b. **The state and date of incorporation of the Company, the date of qualification to do business in the State of New York and the Company's**

**agents for service of process in the state of incorporation and the State of New York.**

The Company was formed in Oregon on July 30, 1946. It was qualified as a Foreign Business Corporation in New York on July 2, 2007. The agent for service for the Company in the State of New York is: CT Corporation System, 111 Eighth Avenue, 13th Floor, New York, NY 10011.

- c. **The identity of the Chief Executive Officer or other presiding officer of the Company.**

Tamara Lundgren is the President and Chief Executive Officer of the Company.

- d. **If the Company is a successor to any other entity by merger, asset or stock acquisition, change of name or other activity, identify each predecessor and identify the nature of the succession.**

Not applicable.

- e. **If the Company is a subsidiary or division of another entity, identify each parent entity and date and state of incorporation or organization and date of qualification to do business in New York State and that entity's agents for service of process in the state of incorporation and the State of New York.**

Not applicable. SSI is a publicly traded company listed on the NASDAQ Global Select Market.

2. **Future EPA Communications: If the addressee of this letter requests that future communications from EPA regarding the Site be sent to a particular individual or office, provide the name, address, telephone number, e-mail address and capacity of such individual or office.**

Richard C. Josephson  
Senior Vice President and General Counsel  
Schnitzer Steel Industries, Inc.  
3200 Northwest Yeon Avenue  
Portland, Oregon 97210  
503-323-2744  
rjosephson@schn.com

and

William J. Squires III  
Bingham McCutchen LLP  
One Federal Street  
Boston, Massachusetts 02110  
617-951-8273  
william.squires@bingham.com

## **Section 2.0 Company Owner/Operator Information of the Facility**

### **3. Company's Relationship to the Facility. Identify the Company's relationship to the Facility (see Definition number 9.a for "Facility"), including:**

- a. The Company's ownership and operational interest in the Facility including the corporate identity of any entity affiliated with the Company that holds or held such interest.**

SSI has never owned or operated the Facility or the Site. As part of a joint venture between Hugo Neu Corporation ("HNC") and an indirect subsidiary of SSI, Joint Venture Operations, Inc. ("JVOI"), SSI indirectly held a 50% partnership interest in Hugo Neu Schnitzer East ("HNSE") (f/k/a Prolerized Schiabo-Neu Company ("PSN")) from January 30, 1998 to September 30, 2005. HNC was the managing member of the joint venture. During that time period, HNSE conducted scrap metal operations at the Facility.

As shown in the corporate organizational chart enclosed herewith as Attachment B, SSI owned 100% of the outstanding shares of Proler International Corp. ("PIC"), which it acquired in 1996. During the time SSI owned PIC, PIC owned 100% of the outstanding shares of Proler Steel Inc. ("PSI"), which in turn owned 100% of the outstanding shares of JVOI. On or about January 30, 1998, HNC and JVOI each purchased one-half of the partnership interest in an entity that would subsequently become HNSE.

On September 30, 2005, JVOI and HNC unwound their joint venture pursuant to a June 8, 2005 Master Agreement. As part of the Master Agreement, an affiliate of HNC acquired all of JVOI's partnership interests in HNSE, resulting in HNC's indirect ownership of 100% of the partnership interest in HNSE. In connection with the unwinding of the joint venture, HNC and certain of its affiliates agreed to indemnify and defend JVOI and SSI from any liabilities associated with the Facility.

Please refer to the response letters from HNC and Sims to EPA's Request for Information (collectively, the "Responses of HNC and Sims") for an explanation of the corporate organizational structure of HNSE after September 30, 2005.

- b. If the Company (or an affiliate of the Company) was the owner of the Facility, identify all acquisitions, dispositions or other transfers of the property, the dates and purposes of all such transfers and the identity and relationship, if any, between the Company and the transferor and transferee. If the Company was not the owner, identify the owner and the instrument by which the Company had the right to operate at the Facility.**

The Company never owned or operated the Facility. Please refer to the above response to Request 3(a) and the Responses of HNC and Sims for the corporate history of the owner and operator.

c. **Dates of the Company's operation at the Facility.**

The Company never operated at the Facility.

d. **Dates of operations at the Site of entities affiliated with the Company, including Schiavone-Bonomo Corporation and the Proler entities.**

The Company held an indirect 50% ownership interest in HNSE from 1998 to 2005, during which time HNSE operated at the Site. For additional detail regarding the Company's indirect ownership in HNSE, refer to the above response to Request 3(a). The Company has no information regarding the operation of the Site during other time periods. Please refer to the Responses of HNC and Sims for information regarding other time periods.

e. **The principal business and each other line of business conducted by the Company at the Facility.**

The Company has never conducted business at the Facility. It is the Company's understanding that the principal business conducted at the Facility has been scrap metal recycling. Please refer to the Responses of HNC and Sims for additional information regarding the nature of business conducted at the Facility.

f. **Identify all entities (e.g., joint venture partners, lessees, licensees) which concurrently with the Company exercised actual control or who held significant authority to control activities at the Facility.**

The Company has never exercised control over activities at the Facility. Please refer to the above response to Request 3(a) for additional detail.

g. **Provide a copy of all deeds and memoranda of lease evidencing all acquisitions, dispositions or other transfers or leases, of the Facility.**

The Company has not identified any information or documentation in its possession that is responsive to this request.

4. **Identify the Company's relationship, if any, to the following entities, and the interest of each such entity at the Facility. Please provide corporate documentation including certificates of organization, certificates of merger, partnership or joint venture agreements, acquisition agreements, etc. as they relate to the relationship of the Company to the entity and to the Facility:**

- i. **Prolerized Schiabo-Neu Company**
- ii. **Hugo Neu & Sons, Inc., Hugo Neu Corporation.**
- iii. **Proler Steel Corporation and Proler International Corp.**
- iv. **Schiavone-Bonomo Corporation.**
- v. **Hugo Neu Schnitzer Company.**

- vi. **Hugo Neu Schnitzer East.**
- vii. **Joint Venture Operations, Inc.**

To the extent the entities listed above in (i) - (vii) have a relationship to the Company, it has been described above in response to Request 3(a). Please also refer to the corporate organizational chart, enclosed as Attachment C, which reflects the corporate structure as of 1996.

- viii. **Sims Group, Ltd., Sims Metal Management and Sims Hugo Neu Corporation.**

Please refer to the Responses of HNC and Sims.

- ix. **Please identify those entities affiliated with the Schnitzer Steel family of entities that have or had a relationship to the Hugo Neu companies or to the Facility and identify their corporate status and their role in the Schnitzer Steel corporate structure.**

Please refer to the above response to Request 3(a).

- 5. **Other Newtown Creek Properties. Please identify each Other Newtown Creek Property (see Definition number 9.b for “Other Newtown Creek Property”), if any, including:**
  - a. **Nature of the Company’s interest in each Other Newtown Creek Property.**
  - b. **Corporate identity of any entity affiliated with the Company that holds or held such interest.**
  - c. **Address, Borough, Block and Tax Lot Identification of each Other Newtown Creek Property.**
  - d. **Map or schematic locating each Other Newtown Creek Property.**
  - e. **Dates of acquisition and date of disposition of interest and dates of the Company’s operations at each Other Newtown Creek Property.**
  - f. **The principal business and each other line of business conducted by the Company at each Other Newtown Creek Property.**
  - g. **Provide a copy of all instruments evidencing the acquisition or conveyance of such interest (e.g., deeds, leases, licenses, purchase and sale agreements, joint venture or partnership agreements, etc.).**

The Company has not identified any information or documentation in its possession responsive to Requests 5(a) - (g).

6. **Facility Plan and Other Photographs, Maps, Drawings, ad Surveys.**

- a. **Provide a diagram or depiction of the Facility at the time that it was owned or operated by the Company (“Facility Plan”)**

The Company is not in possession of any such diagrams or depictions.

- b. **Provide a copy of photographs, surveys, Sanborn maps, etc. in the Company’s possession showing the location and configurations of buildings, improvements and infrastructure, including:**
- i. **storm sewers;**
  - ii. **solid waste management units;**
  - iii. **above-ground structures and infrastructure including buildings, tanks, spill containment facilities;**
  - iv. **storm water management systems;**
  - v. **over-water or in-water facilities (e.g., piers, docks, cranes, bulkheads, pipes, treatment facilities, etc.); and**
  - vi. **discharge facilities including pipes, ditches or other conveyance features and outfalls to Newtown Creek at any time during the Company’s operation of the Facility.**

The Company has not identified any information or documentation in its possession responsive to Requests 6(b)(i) through (vi).

7. **Ownership of Newtown Creek: At the present time or at any past time, has the Company or any affiliate:**

- a. **Owned any portion of Newtown Creek or wetlands associated with Newtown Creek?**

Except as otherwise noted in response to Request 3(a) above, neither the Company nor, to the Company’s knowledge, any affiliate presently or formerly owned any portion of the Newtown Creek or wetlands associated therewith.

- b. **Asserted control over or exclusive rights to use any area of Newtown Creek or wetlands associated with Newtown Creek, for any purpose including, without limitation, dredging, filling, construction, maintenance or repair of any facility located in the waters, the associated wetlands or sediments, including, by way of example, bulkheads, rip rap, pipes, wharfs, piers, docking, loading or unloading facilities, cranes or other over-water facilities?**

Except as otherwise noted in response to Request 3(a) above, neither the Company nor, to the Company's knowledge, any affiliate has asserted control or rights over any area of Newtown Creek or wetlands associated therewith.

**If the answer to either subparagraph "a" or "b" of this paragraph is yes, please identify the areas owned or controlled, or over which the Company has or had a right to use, provide an explanation of how and from whom the Company acquired such ownership or control, provide a copy of all title documents, leases, permits or other instruments where such right was derived, and describe all activities conducted pursuant thereto.**

Not applicable.

**8. Operations In Newtown Creek:**

- a. **Identify and show on the Facility Plan all current and previous Company outfalls or discharge points from the Facility into Newtown Creek, including location, identification, characteristics and source of effluent, and associated permits.**

The Company has not identified any information or documentation in its possession responsive to this request.

- b. **Describe all activities at the Facility that were conducted over, on, under, or adjacent to, Newtown Creek. Include in your description whether the activity involved hazardous substances, industrial waste, petroleum, or recyclable material and whether any materials were ever discharged, spilled, disposed of, dropped, or otherwise came to be located in Newtown Creek.**

The Company has not identified any information or documentation in its possession responsive to this request.

- c. **Has the Company, or any affiliate, joint venture or partner, at any time, constructed or operated any facility in or over the waters or on the sediments of Newtown Creek, including any bulkheads, rip-rap, pipes, wharfs, piers, docking, loading or unloading facilities, containment booms, cranes or other on-water or over-water facilities?**

Except as otherwise noted in response to Request 3(a) above, neither the Company nor, to the Company's knowledge, any affiliate, joint venture or partner has ever constructed, operated or utilized any facility in or over the waters or on the sediments of Newtown Creek.

- d. **Has the Company, or any affiliate, joint venture or partner at any time constructed, operated or utilized any facility under the waters or sediments of Newtown Creek, including without limitation pipes, pipelines, or other underwater or under sediment facilities?**

Except as otherwise noted in response to Request 3(a) above, neither the Company nor, to the Company's knowledge, any affiliate, joint venture or partner has ever constructed, operated or utilized any facility under the waters or the sediments of Newtown Creek.

- e. **If the answer to subparagraph "b" or "c" of this paragraph is yes, please provide details including:**

Not applicable.

- i. **the facilities constructed or operated, the dates of such construction, replacement or major modification, whether there were discharges into the waters of Newtown Creek associated with construction or maintenance of such facilities, and all permits associated with the construction or operation; and**
  - ii. **the source of the Company's authorization to construct or maintain such facilities in Newtown Creek including identification of the operating document (deed, lease, easement, license, permit, etc.) and the identity of the grantor, and provide copies of the relevant deeds, leases, licenses and permits.**
- f. **Provide a summary of over-water activities conducted at the Facility, including but not limited to, any material loading and unloading operations associated with vessels, materials handling and storage practices, ship berthing and anchoring, ship fueling, cleaning, maintenance, or repair.**

The Company has not identified any information or documentation in its possession responsive to this request.

9. **Fill. With regard to the placement of fill at the Facility:**

- a. **Was any fill placed on the Facility property during the initial development or subsequent redevelopment of the Facility? If so, show on the Facility Plan all areas where fill was placed, and identify the lateral extent of the fill and the depth of the fill, the purpose of the placement, and the source and amount of the fill in each area. State whether the fill has ever been characterized, either before placement or thereafter and, if so, provide a copy of the sampling/characterization results.**
- b. **Were any portions of the Facility historically part of Newtown Creek or did the Facility formerly include any marshlands or wetlands associated with Newtown Creek? Please depict any such wet areas on the Facility Plan. Please provide your understanding of who filled any such wet areas, the approximate date of such fill, and the lateral extent and depth of such fill, the source of the fill material, the composition of the fill and, if any sampling has ever been conducted in such filled areas, provide a copy of the sampling results.**

The Company has not identified any information or documentation in its possession responsive to Request 9 (a) - (b).

10. **Vessels.** Has the Company utilized barges, tankers or other vessels in any operations on Newtown Creek? With respect to vessel operations, identify the owner of the vessels and the products and raw materials transferred to or from vessels. Provide a copy of permits relating to such activities as well as Company manuals addressing spill prevention methodologies and all reports pursuant to 33 CFR Part 155 or predecessor regulations. Describe how procedures changed over the years to limit or prevent metal debris and auto shredder residue from discharging to Newtown Creek. Please identify each instance of a sinking, collision, fire or other casualty to a vessel loaded with Company scrap, including the date of each such instance, the vessel owner, the location in Newtown Creek of the occurrence, and the nature and quantity of scrap material on the vessel at the time of the occurrence. Please provide a copy of each report in the Company's possession and each correspondence or communication with a governmental body related to each such instance.

The Company has not identified any information or documentation in its possession responsive to this request.

11. **Data and Reports.** Provide a copy of all reports, information or data you have related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about the Facility. Provide copies of all documents containing such data and information, and analysis or interpretation of such data.

Please see Attachment C, the "Document Summary by Site," dated November 27, 1996. This index was prepared by representatives of SSI during an in person due diligence document review conducted prior to the consummation of the joint venture with HNC. The Index has a few brief line items relating to data and/or reports. The Company has not identified any other information or documentation in its possession responsive to this request.

12. **Solid Waste Management Units.** Identify all solid waste management units or areas (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, drainage ditches, tanks, drums, container storage areas, etc.) now or formerly at the Facility during the period of the Company's ownership or operation. For each such unit or area, provide the following information, if available:
  - a. the type of unit/area (e.g., storage area, landfill, waste pile, etc.), dimensions and dates of use of the unit/area;
  - b. the purpose and past usage (e.g., storage, spill, containment, etc.);
  - c. the quantity and types of materials (hazardous substances and any other chemicals) located in each unit/area;

- d. **the volume, size and construction (materials, composition) of each unit/area; and**
- e. **if the unit/area described above was closed by the Company, explain how such unit/area was closed and provide relevant documentation.**

The Company has not identified any information or documentation in its possession responsive to Requests 12 (a) - (e).

13. **Pipes, Drains, Sheet flow, Etc. Identify each pipe, ditch or other conveyance, including sheet flow ("conveyance") that currently drains or formerly drained the Facility during the period of the Company's ownership or operation. State whether such conveyance discharged to Newtown Creek or to another conduit or discharge location. Include in your response:**

- a. **The type (pipe, ditch, sheet flow) of conveyance.**
- b. **The location of each conveyance at each Facility.**
- c. **The source of effluent (whether at the Facility or from an upland source) and, if an upland source, the identity of upland facilities.**
- d. **The characteristics of the effluent.**
- e. **Copies of all permits associated with such discharge including all SPEDES permits.**

The Company has not identified any information or documentation in its possession responsive to Requests 13 (a) - (e).

14. **Facility Drainage Studies. Provide copies of any storm water or drainage studies for the Facility, including each storm water pollution prevention plan prepared by or for the Company. Provide a copy of all data from sampling conducted for the Facility on storm water, sheet flow, or surface water runoff.**

The Company has not identified any information or documentation in its possession responsive to this request.

15. **Connections to New York City sewer system:**

- a. **State whether the Facility was connected to the New York City sewer during the Company's ownership or operation and the date that the Facility was first connected.**
- b. **State whether the Facility ever discharged liquid wastes other than through the New York City sewer system and, if so, provide details on such discharges.**

- c. **State whether the Facility participated in the New York City pretreatment program, whether the Company has ever been classified as a significant industrial user, and whether the Company has ever been in violation of sewer use requirements or permits or received any notices of violation relating to use of the New York City sewer system.**
- d. **Provide copies of all permits and permit applications for New York City Industrial Wastewater discharge permits.**
- e. **Provide copies of all notices of violations, correspondence, hearing transcripts and dispositions relating to the Company's use of the New York City sewer system.**
- f. **Provide copies of any Baseline Monitoring Reports submitted to New York City in connection with the Company's application for an industrial wastewater discharge permit.**
- g. **Provide copies of all surveys, reports or analyses delineating or characterizing the Company's liquid wastes.**

The Company has not identified any information or documentation in its possession responsive to Requests 15 (a) - (g).

### **Section 3.0 Company's Operational Activities**

16. **Company's Business Operations. Describe the Company's operations or business activities at the Facility. If the products, processes, operation, or business activity changed over time, please identify each separate operation or activity, the dates when each operation or activity was started and, if applicable, ceased. Also, please provide the following:**
  - a. **Identify and describe the principal business operations conducted at the Facility and all other business activities conducted at each Facility. If dismantling, shredding and separation occurred at the Facility, describe such operations.**
  - b. **Provide schematic diagrams in the Company's possession illustrating the Company's operations at the Facility.**
  - c. **Identify where Company stored feedstock, shredded metals and auto shredder residue at the Facility from the Company's initial operations at the Facility until the time of final operations.**
  - d. **Identify hazardous substances present in shredded metals and auto shredder residue received or stored at the Facility and provide copies of Company data characterizing such materials at all periods of operation of the Facility.**

- e. **Copies of Material Safety Data Sheets (“MSDSs”) for raw materials used and products produced in the Company’s operations at the Facility.**

The Company did not operate or have any business activities at the Facility. The Company has not identified any information or documentation in its possession that is responsive to Requests 16 (a) - (e).

- 17. **Cleaning of Machinery, Tank and Equipment. Identify machinery, equipment and tank cleaning procedures, chemicals and other materials used in cleaning operations, and management of bottoms and other wastes resulting from cleaning operations.**

The Company has not identified any information or documentation in its possession responsive to this request.

- 18. **Materials Used, Produced and Generated at the Facility. Identify the metals feedstock received from time to time at the Facility, including automobiles, white good, demolition materials or other and the output generated from the feedstock.**
  - a. **From the date of the Company’s initial operations, identify whether the feedstock contained PCBs and, if so, the amount of PCBs generated each year from shredding operations and how the PCBs were collected and handled.**
  - b. **From the date of the Company’s initial operations at the Facility, identify the volume of auto shredder residue generated each year and how the auto shredder residue was stored and managed at the Facility.**
  - c. **Identify all waste streams generated at the Facility from the date of the Company’s initial operations at the Facility and how those waste streams were stored, managed and disposed of.**
  - d. **Describe what the Company did with the hazardous wastes, hazardous substances, and industrial wastes that it used, stored, generated, or otherwise handled at the Facility after it was finished with them? For each disposal location and method, state the nature and quantity or the material disposed on an annual basis.**

The Company has not identified any information or documentation in its possession responsive to Requests 18 (a) - (d).

- 19. **Oil/Water Separators. Identify all oil/water separators at the Facility during the Company’s ownership or operation including dates of installation, dates of replacement or major modification, purpose of installation and source of influent, and location of discharge. Provide a copy of each permit and permit application, influent and effluent sampling results and copies of all submissions to federal, state, city or county environmental agencies or public health agencies relating to oil/water separators.**

The Company has not identified any information or documentation in its possession responsive to this request.

20. **Storage Tanks.** Identify each fixed above-ground storage tank and each fixed below-ground storage tank that is or was situated on the Facility during the Company's ownership or operation. Provide a copy of all permits relating to the tank and provide a copy of all Company written manuals or procedures, including manuals that have been superseded by newer manuals or procedures, addressing use and maintenance of such tanks. For each tank, identify:
- a. **Date of installation and dates and nature of major modifications.**
  - b. **Dates of installation and nature of spill detection equipment.**
  - c. **Dates of installation and nature of cathodic protection equipment.**
  - d. **Description or drawing of each such tank.**
  - e. **The identity of contents that have been stored in any such tank both before (if known) or during the Company's ownership or operation.**
  - f. **Tank cleaning practices.**
  - g. **Manner of ultimate disposal of wastes from the tank.**
  - h. **All spills that occurred during the Company's ownership of the Facility.**
  - i. **Copies of reports or manuals in the Company's possession relating to the storage tanks and the foregoing questions.**

The Company has not identified any information or documentation in its possession responsive to Requests 20 (a) - (g).

21. **Storage and Combustion of Coal.** Did the Company store or combust coal at the Facility during the time of its ownership or operation? If your answer is yes, please provide the following information for all periods of time that the Company operated at or owned the Facility:

The Company has never owned or operated the Facility and, consequently, did not store or combust coal at the Facility.

- a. **The purpose for which coal was present at the Facility.**
- b. **The annual volume and type or types of coal (i.e. bituminous, anthracite, etc.) handled at the Facility.**
- c. **The location and manner of coal storage at the Facility**
- d. **Identify all coal storage, shipment and transfer and process locations on the Facility Plan.**

The Company has not identified any information or documentation in its possession responsive to Requests 21 (a) - (d).

22. **Identify and depict on the Facility Plan, each pipeline serving the Facility that is or was situated on the Facility property (either above- or below-ground) during the Company's ownership or operation.**

The Company has not identified any information or documentation in its possession responsive to this request.

#### **Section 4.0 Civil Litigation, Administrative Enforcement and Criminal Matters**

23. **Civil Litigation, Administrative Enforcement and Criminal Matters:**

- a. **Has the Company been a party to any litigation or involved in any other claim where an allegation by or against the Company included environmental contamination of Newtown Creek or contamination of any upland property located within 1,000 feet of Newtown Creek (whether the claim was based on the Company's alleged ownership, operation, transporter status, or arranger relationship to the upland property or some other basis)? If yes, identify such litigation or claim, briefly describe the allegation by or against the Company, the status of the litigation or claim, and provide a copy of the pleadings and any settlement agreement or court order.**

No.

- b. **Has the Company or an affiliate been identified by EPA or by any New York State or New York City agency as a party responsible for environmental contamination at or from the Facility or at or from any other upland facility located within 1,000 feet of Newtown Creek (whether the claim was based on the Company's alleged ownership, operation, transporter status, or arranger relationship to the Facility or to the other upland property or some other basis)? If yes, state the Company's understanding of the basis for such notice of responsibility and provide a copy of any correspondence, orders or agreements between the Company and the governmental agency.**

No.

- c. **Has the Company or an employee, affiliate, contractor or agent ever been accused of any criminal violation relating to illegal disposal or any other environmental matter in connection with any activity or operation at the Facility? If so, describe the disposition of such accusation and provide details on such accusation.**

No.

24. **Identification of Other Entities that may have Released or Discharged Hazardous Substances to Newtown Creek.** Does the Company have additional information or documents which may help EPA identify other companies, governmental entities or individuals who may be responsible for the discharge or release of hazardous substances into Newtown Creek whether as owner or operator of a facility involved in such release or discharge or as person who may have arranged for such disposal or otherwise? If so, please identify such facilities and provide any such information and documents relevant to such discharge or release.

Please refer to the Responses of HNC and Sims. The Company has not identified any information or documentation in its possession responsive to this request.

#### **Facility Releases, Investigations and Remediation**

25. **Releases at or from the Facility.** Has the Company or the Company's contractors, lessees, tenants, or agents ever provided notice to or made a report to any EPA or any New York State or New York City agency concerning a spill or release involving the Facility or involving Newtown Creek? If so, describe each spill or release and provide copies of all communications between the Company and federal, state or local regulatory agency.

No.

26. **Soil Removal Actions.** Has any contaminated soil ever been excavated or removed from the Facility during the period of the Company's ownership or operation? If yes, identify the reason for such soil action, the dates of such action, the location at the Facility and whether the soil removal was performed under the oversight of EPA, New York State Department of Environmental Conservation ("NYSDEC") or New York City Department of Environmental Protection ("NYCDEP") or any other regulatory agency. Provide copies of all reports containing a description of the soil excavation and all data and analyses and copies of any orders or agreements with any regulatory agencies that required or oversaw the work.

The Company has never owned or operated the Facility. The Company has not identified any information or documentation in its possession pertaining to excavation or removal of contaminated soil from the Facility.

27. **Groundwater Action.** Has groundwater at the Facility ever been treated, pumped, or been subject to any kind of response action during the period of the Company's ownership or operation? If yes, identify the reason for such groundwater action, the dates of such action, the location at the Facility, and whether the groundwater action was performed under the oversight of EPA, NYSDEC or NYCDEP or any other regulatory agency. Provide copies of all reports containing a description of the groundwater action and all data and analyses, and copies of any orders or agreements with any regulatory agencies that required or oversaw the work.

The Company has not identified any information or documentation in its possession responsive to this request.

28. **Releases into Subsurface units.** Was there ever a spill, leak, release or discharge of waste, or process residue, including hazardous substances, pollutants, contaminants, industrial waste, or petroleum, into any subsurface disposal system or floor drain inside or under a building situated at the Facility? If yes, provide details of each event and any communication with any federal, state or city regulatory body.

The Company has not identified any information or documentation in its possession responsive to this request.

29. **Releases to Newtown Creek.** Was there ever a spill, leak, release or discharge of a hazardous substance, industrial waste, petroleum or other material into Newtown Creek from the Facility or from any equipment, structure, or activity occurring on, over, or adjacent to Newtown Creek? If yes, identify such release and provide copies of any documents regarding the nature of the material released, the dates of each such occurrence, the amount and location of such release, and whether there was any action to treat or recover any materials that were the subject of the release. Provide copies of all reports containing a description of the release and all data and analyses, and copies of any orders or agreements with any regulatory agencies that required or oversaw the work.

The Company has not identified any information or documentation in its possession responsive to this request.

30. **Environmental Investigations at the Facility.** Describe the purpose for, the date of initiation and completion, and the results of any investigations of soil, water (ground or surface), sediment, geology, hydrology, or air quality on or about the Facility. Provide copies of all data, reports, and other documents that were generated by the Company or by its contractor or consultant, or by a federal or state regulatory agency related to the investigations that are described.

The Company has not identified any information or documentation in its possession responsive to this request.

31. **Phase I, Phase II and Other Environmental Investigations.** Please provide copies of all environmental investigation reports in the Company's possession relating to the Facility.

The Company has not identified any information or documentation in its possession responsive to this request.

## **Section 5.0 Regulatory Information**

32. **Regulatory Agencies with Jurisdiction Over the Facility.** Identify each federal, state and local authority that regulates environmental concerns relating to the ownership or operation at the Facility, the contact point at such agency, the

**activity regulated and the applicable federal, state and local statute or regulation from which such regulatory authority was derived.**

Please refer to the Responses of HNC and Sims. The Company has not identified any information or documentation in its possession responsive to this request.

33. **Notices of Violation. Describe all occurrences associated with violations, citations, deficiencies, and/or accidents concerning the Facility related to environmental concerns. Provide copies of all documents associated with each occurrence described.**

Please see Attachment C, the "Document Summary by Site," dated November 27, 1996. This index was prepared by representatives of SSI during an in person due diligence document review conducted prior to the consummation of the joint venture with HNC. The Index has a few brief line items relating to potential violations related to environmental concerns. The Company has not identified any other information or documentation in its possession responsive to this request.

34. **Environmental Permits. Provide a list of all local, state and federal environmental permits which have been applied for or issued to the Company with respect to the Facility for any media or activity, including, without limitation, State Pollutant Discharge Elimination System, New York City Sewer system, excavation and fill in navigable waters, dredging, tidal wetlands, air, solid waste or hazardous waste, treatment, storage, or disposal activities, etc. under any environmental statute or regulation. Please show the dates of issuance of each permit and provide a copy of each federal or state permit and the applications for each permit.**

Please see Attachment C, the "Document Summary by Site," dated November 27, 1996. This index was prepared by representatives of SSI during an in person due diligence document review conducted prior to the consummation of the joint venture with HNC. The Index has a few brief line items relating to environmental permits. The Company has not identified any other information or documentation in its possession responsive to this request.

## **Section 6.0 Compliance with this Request and Financial Information**

35. **Persons and Source Materials Consulted in Your Response: Identify all persons, other than counsel, that the Company consulted, and all source materials that the Company reviewed in responding to this request, including, but not limited to, the names of persons consulted, the contact information for such persons, and if those persons are current or former employees, the job title and responsibilities for such persons and the dates of employment, and identify which questions those persons were consulted about**

Richard C. Josephson  
Senior Vice President and General Counsel  
Schnitzer Steel Industries, Inc.  
3200 Northwest Yeon Avenue

Portland, Oregon 97210  
503-224-9900  
rjosephson@schn.com

Thomas Zelenka  
Vice President  
Schnitzer Steel Industries, Inc.  
3200 Northwest Yeon Avenue  
Portland, Oregon 97210  
503-323-2821  
tzelenka@schn.com

36. **Persons Having Responsibility for Environmental Matters at the Facility.** Identify all individuals who currently have and those who previously had responsibility for the Company's environmental matters (e.g. responsibility for the disposal, treatment, storage, recycling, or sale of the Company's wastes). Also provide each such individual's job title, duties, dates performing those duties, supervisors for those duties, current position or the date of the individual's resignation, and the nature of the information possessed by such individuals concerning the Company's waste management.

None. As previously noted, the Company has never owned or operated the Facility and, consequently, does not now and has never had "environmental matters" at the Facility.

37. **Financial Information:** Provide a copy of the Company's certified annual financial statements for each of the most recent three years available.

Please access copies of the Company's financial statements at the following website:

[http://www.schnitzersteel.com/investor\\_materials.aspx](http://www.schnitzersteel.com/investor_materials.aspx)

38. **Insurance and Indemnification:**

- a. **Provide a schedule of liability insurance policies that may provide coverage to the Company for environmental liability associated with Newtown Creek.**

As the Company has never owned or operated the Facility and is not subject to any claim or demand, the Company is not presently able to assess the potential for coverage under insurance policies held by the Company. For the sake of clarity, the Company has no knowledge of any insurance policy that expressly references Newtown Creek, the Site or the Facility. The Company is not in possession or control of any insurance policies that may have been issued to HNSE, HNC or their respective affiliates. As such, the Company is unable to evaluate whether such policies, if any, may provide coverage to the Company for environmental liability associated with Newtown Creek. This response is not intended as an admission with respect to potential coverage under any insurance policies for environmental liability associated with Newtown Creek.

- b. **Identify each entity that may have a duty to indemnify the Company for any potential environmental liability in connection with Newtown Creek, identify the circumstances giving rise to the indemnity, and provide a copy of any document that reflects a requirement to so indemnify the Company.**

Hugo Neu Corporation, Hugo Neu Co., LLC, HNE Recycling LLC and HNW Recycling LLC (collectively "HNC Entities") have a duty to indemnify and defend the Company and JVOI from any liabilities associated with the Facility pursuant to that certain Master Agreement, dated June 8, 2005, by and among HNC Entities, JVOI and the Company. In addition, please refer to the Responses of HNC and Sims with respect to the indemnification obligation of Sims and its affiliates regarding the Facility.

- c. **Identify each entity that the Company has agreed to indemnify for any potential environmental liability in connection with Newtown Creek, identify the circumstances giving rise to the indemnity, and provide a copy of any document that reflects a requirement to so indemnify by the Company.**

None.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION  
NEWTOWN CREEK SUPERFUND SITE

State of Massachusetts:

County of Suffolk:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that the Company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my Company's response thereto should become known or available to the Company.

William J. Squires III  
NAME (print or type)

Counsel

TITLE (print or type)

Bingham McCutchen LLP  
COMPANY NAME

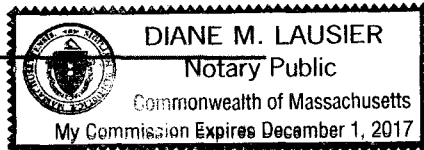
W. Squires III  
SIGNATURE

Sworn to before me this 4<sup>th</sup> day of October, 2012

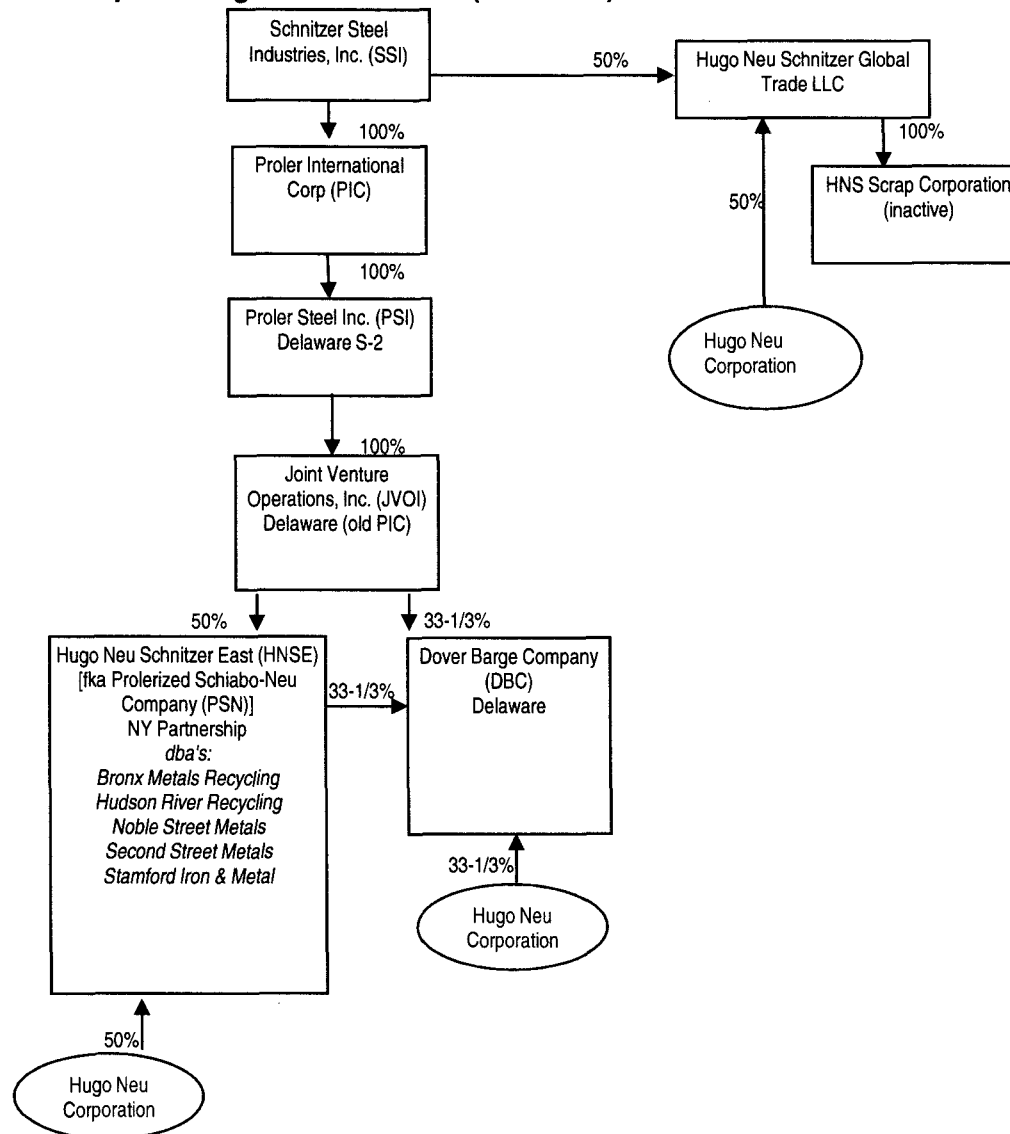
Diane M. Lausier  
Notary Public

My commission expires:

[STAMP OR SEAL]



**Attachment B**  
**Corporate Organizational Chart (1998-2005)**



## Document Summary by Site

Site	Title	Date	Type	Pgs.	Author	Author Representing	File Location	Fundamental Conclusions
Long Island - Greenspoint Ave	Queens Plot Plan		Map	1			PSN file drawer	Site is bordered by Newtown Creek, Dutch Kills, Long Island RR, and Buckeye Pipeline
Long Island - Greenspoint Ave			Permit			NYSDEC	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Permit for baghouse to control emissions when lime and cement silo being filled. 99% efficiency, 1 lb/hr particulate emissions. Allows 2 hr/day, 360 days/year operation.
Long Island - Greenspoint Ave	Permit PA017577H		Permit			NYCDEP Dept of Air Resources	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Permit for one scrap metal shredder and 43,000 cfm cyclone. Allows 5 hrs/day, 240 days/year operation. No other limits in permit. Expires 6/24/98.
Long Island - Greenspoint Ave			Permit			NYSDEC Div of Air	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Permit for cyclone on ferrous product conveyor of shredder to remove residual dirt from scrap. 42,000 cfm. 99.8% efficiency, 5.3 lb/hr particulate emissions (33% glass/glass fibers, 67% plaster/synthetic). Allows 5 hr/day, 240 days/year operation. Stack testing required and performed. Expires 7/8/98.
Long Island - Greenspoint Ave	Permit 174/77K		Permit			NYCDEP Bureau of Air resources	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Permit for 10,000-hp diesel generator. Allows 4.5 hr/day, 250 days/year operation. Expires 7/31/99.
Long Island - Greenspoint Ave			Permit			NYSDEC Div of Air	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Permit for water manifold control device for car shredding. 99% efficiency, 1.8 lb/hr particulates and 1.9 lb/hr particulate organic emissions. Allows 5 hr/day, 240 days/year operation. Stack testing required and performed. Expired 6/23/96—no renewal in file.
Long Island - Greenspoint Ave	Permit No. 630000-0125		Permit			NYSDEC Div of Air	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Permit for cyclonic air separator for shredder #1 magnet. 99% efficiency, 13.5 lb/hr particulates and 27.1 lb/hr particulate organic emissions. Allows 5 hr/day, 240 days/year operation. Stack testing required and performed. Expired 6/23/96—no renewal in file.

## Document Summary by Site

Site	Title	Date	Type	Pgs.	Author	Author Representing	File Location	Fundamental Conclusions
Long Island - Greenspoint Ave	Petroleum Bulk Storage Registration Certificate 2-095354		Permit			NYSDEC	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Permit for 150,000-gallon AST. Monthly visual inspections on tank required. Expires 5/7/97.
Long Island - Greenspoint Ave	SPDES Permit No. GP-93-05		Permit	10			Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	This is a general permit. Permit expires 8/1/96; requires annual sampling for COD, oil & grease, TSS, and pH. No discharge limits specified in permit.
Long Island - Greenspoint Ave	Permit 679/83Z		Permit			NYCDEP Dept of Air Resources	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Permit for two auxiliary generators (one is backup). 2400 cfm. Allows one generator 15 hrs./day, 365 days/year operation. 0.10% sulfur limit for diesel fuel. Stack testing performed 2/93. Expires 2/15/99.
Long Island - Greenspoint Ave			Letter		PSN		NYSDEC 47-40 21st Street, L.I.C., NY	Correspondence about PROPAT as a landfill daily cover material.
Long Island - Greenspoint Ave	Air Permit File		Letter		Correspondence/p ermits between the NYSDEC, PSN, and consultants.		NYSDEC 47-40 21st Street, L.I.C., NY	NYSDEC air permit forms (7 emission points), stack testing proposals, results of stack testing.
Long Island - Greenspoint Ave	Letter to Mr. Norman Nosenchuck, P.E., Director, NYSDEC Div of Solid Waste	8/9/91	Letter	2	Harvey Schutz	HWS Solutions, Inc.	NYSDEC 47-40 21st Street, L.I.C., NY	Discussion of upcoming meeting between DEC & PSN about PROPAT. Says that company only accepts clean auto hulks which have had all fuel tanks and ks and lines removed.
Long Island - Greenspoint Ave		1/24/92	Letter		Fire Dept		Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Violation issued regarding 150,000-gallon fuel tank- for not having certified supervision on site 24 hrs/day, 7 days/week, and bulk oil operating permit expired.
Long Island - Greenspoint Ave		2/25/92	Notes		Nick Scouranza	Fire Dept	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Fire Dept inspection notes re: explosions. Facility admitted to having some; asked to be kept to a minimum.
Long Island - Greenspoint Ave		4/23/92	Notes		Search Warrant	Police Dept	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Auto Crime Division warrant seizing computer print-out files for 4/16/92 incoming and outgoing scale tickets.
Long Island - Greenspoint Ave	ISRI - PSN stormwater	6/5/92	Report	3		ISRI	PSN file drawer	Grab sample for stormwater - lead at 63 ppb and copper at 170 ppb and zinc at 1400 ppb; no PCBs.

## Document Summary by Site

Site	Title	Date	Type	Pgs.	Author	Author Representing	File Location	Fundamental Conclusions
Long Island - Greenspoint Ave		7/23/92	Notes			Coast Guard	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Coast Guard reported oil running into Newtown Creek. No pollution observed in waters around PSN facility. Small patches of sheen in puddles around bulkhead.
Long Island - Greenspoint Ave		10/1/92	Letter			Fire Dept.	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Various paperwork deficiencies noted by Fire Dept. No penalties imposed.
Long Island - Greenspoint Ave		10/22/92	Letter			Fire Dept.	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Hydrostatic test on hydrant system failed.
Long Island - Greenspoint Ave		4/13/93	Letter			NYCDEP Air Resources	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Helicopter photos taken by NYCDEP Air Resources over PSN facility on 3/31/93 between 9:40-9:42 a.m. indicated high opacity/smoke plume from generator. Violation to be issued.
Long Island - Greenspoint Ave	PSN Quality Control Plan	4/20/93	Plan	10	Jay Zimmern	PSN	PSN file drawer	Quality Control Plan for the NJ and NY facilities. appears to be similar to that for other facilities.
Long Island - Greenspoint Ave		5/19/93	Notes			PSN	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	NYSDEC complaint about some scrap hanging over the dock at seawall at Newtown Creek; may fall into water. Inquired about car inspections, gas tanks, explosions. Warning slip issued-possible violation of Article 13, 13-0345.2 of Envir. Conserv. Law. Asked about tires and gas tanks found in empty lot next to Buckley(?).
Long Island - Greenspoint Ave		7/12/93	Notes			NYCDEP	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	NYCDEP saw smoke from generator by the highway; prompted onsite inspection. PSN using #2 fuel oil-should be diesel. Violation to be issued (found in file; dated 7/23/93; 60% opacity noted). Corrective action: injectors in generator system removed and cleaned. Now within spec. Need sign to tell truck drivers that engine can only run on idle for 3 minutes. Complaint about dust in yard and payloaders/hydraulic crane exhaust smoke.
Long Island - Greenspoint Ave	Letter to Jay Zimmern, PSN	8/3/93	Letter	2	Phyllis Abwater	NYSDEC Div of Solid Waste	NYCDEP 47-40 21st Street, L.I.C., NY	Approval of PROPAT as daily cover-beneficial use determination.
Long Island - Greenspoint Ave	Stormwater Pollution Prevention Plan (SPPP)	8/1/94	Report	50	Kenneth Woodruff		Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Plan signed 8/1/94; revised 8/15/94 & 8/4/95. Includes stormwater data collected for COD, oil & grease, TSS, and pH on 7/12/95 and 7/28/96. Data meets annual monitoring requirements specified in SPDES permit.

## Document Summary by Site

Site	Title	Date	Type	Pgs.	Author	Author Representing	File Location	Fundamental Conclusions
Long Island - Greenspoint Ave		8/10/95	Notes			OSHA	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	OSHA inspection prompted by complaints from Sanitation Dept that they are finding scrap on their dock. PSN plans to install wire mesh below rubber curtain at dock.
Long Island - Greenspoint Ave		8/18/95	Notes			OSHA	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Followup OSHA inspection on scrap issue. Screens installed. Scrap being found on Sanitation Dept dock/in water Sat & Sun evenings. Mill doesn't run then—camera footage provided to OSHA as proof. Case closed.
Long Island - Greenspoint Ave		8/27/95	Letter			OSHA	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	PSN cited by OSHA due to employee accident (occurred about 8/15/95). Lower belt and roller conveyor not guarded to prevent contact/ protect operators. \$625 fine.
Long Island - Greenspoint Ave		4/4/96	Notes			NYSDEC	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Generator inspection. In compliance.
Long Island - Greenspoint Ave	Annual Report for Waste Automotive (1994&1995)	7/31/96	Letter	1	Lawrence Maglin	PSN	NYSDEC 47-40 21st Street, L.I.C., NY	Letter to NYSDC Div of Solid Waste. Reporting failure to submit reports for 1994 and 1995.
Long Island - Greenspoint Ave		9/3/96	Interview Note					Operated since the mid 60s. Shredder. Diesel engine, AST. 5 acres, 100% paved. ASR is Propat.
Long Island - Greenspoint Ave		9/4/96	Interview Note		Dennis Caputo	Profer	Profers Corp Office	Shredder on site. 5 acres. AGT for diesel generator. ASR sent to several different sites until a few years ago when started using Propat treatment. Site paved. Owned site.
Long Island - Greenspoint Ave		9/13/96	Notes			NYC Dept of Health	Larry Maglin's office, PSN, 1 Linden Avenue East, Jersey City, NJ 07305	Inspection for possible radioactive material. Source may be enclosed in lead. Nothing found. Follow-up visit on 9/16/96—nothing found. NYCDOH thinks it may have gone to PSN's Jersey City facility.
Long Island - Greenspoint Ave	Facility Information Report	10/4/96	Report	1		NYSDEC	NYSDEC 47-40 21st Street, L.I.C., NY	NYSDEC Petroleum Bulk Storage Program Facility Information Report. One active 150,000 gallon tank-product type #3.
Long Island - Greenspoint Ave	Discussion on environmental expenses for next 6-12 months	10/17/96	Interview Note				verbal discussion	Environmental-related work at Long Island City facility in next 6-12 months includes stormwater upgrades—oil/water separator, piping, excavation. Approx. \$50,000.

## Document Summary by Site

Site	Title	Date	Type	Pgs.	Author	Author Representing	File Location	Fundamental Conclusions
Long Island - Greenspoint Ave	Site Visit 10/18/96	10/18/96			Bill Cobb/PDX		CH2M HILL files	Site visit notes: the site is completely paved; it slopes towards Dutch Kills (the canal at the back); there is a 150,000 gal fuel tank with steel walled containment; there are oil stains around the tank area; there are openings in the concrete barrier wall around the site for stormwater to discharge into the waterways; the diesel generator does not have air quality improvements, but its opacity was good while we were there; there is an in-line shredder/PROPAT system; scrap is loaded by conveyor to barges and sent to Jersey City for loading on ships; there is bin storage of PROPAT; there are 3 cranes at the site, as they off-load barges, small amounts of metal can fall into Newtown Creek - it is removed with a magnet every couple of years; they have a repair/maint bldg - some work is done outside; the asphalt is cracked with some liquids on it outside the maint bldg; there are multiple air permits for the site - different jurisdictions for the various sources; the facility is located downriver from Getty off of Greenspoint - there is a side access road between Getty and the railroad lines. Information provided by PSN personnel while at the site: 1) there needs to be \$50k in improvements to the stormwater system.